

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Shelia Denise Stiff, Debtor

**Case No. 25-00984-JAW
CHAPTER 7**

NOTICE OF MOTION TO PARTIALLY AVOID JUDICIAL LIEN

YOU ARE HEREBY NOTIFIED that a Motion to void the Judgment Lien of Smith Rouchon & Associates Inc c/o Robert Camp Johnson has been filed on behalf of Shelia Denise Stiff.

YOU ARE HEREBY FURTHER NOTIFIED that TWENTY-ONE (21) DAYS from the date of this Notice are granted in which a written objection or other responsive pleading must be filed with the Clerk, U.S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran United States Courthouse, 501 E. Court St., Suite 2.300, Jackson, MS 39201; and with the undersigned attorney for the Trustee at the address listed below. If no objections are filed, the Court may consider this matter EX PARTE. Should objections be filed, a hearing will be held on the aforesaid Motion at a date to be later determined by the Court.

Date: July 22, 2025

Signature:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

PO Box 13767

Jackson, MS 39236

601-500-5533

trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Shelia Denise Stiff, Debtor

**Case No. 25-00984-JAW
CHAPTER 7**

MOTION PARTIALLY AVOIDING JUDICIAL LIEN

COMES NOW, Debtor, by and through counsel, pursuant to 11 U.S.C. §522(f) and Bankruptcy Rule 4003(d), and files this his Motion to void the Judgment Lien of Smith Rouchon & Associates Inc c/o Robert Camp Johnson (“Respondent”), and in support thereof, would show the Court as follows:

I.

Debtor commenced this proceeding under Chapter 7 of the Bankruptcy Code on 04/15/2025.

I.

That the Debtor has a Judgment Lien against him obtained by Smith Rouchon & Associates Inc c/o Robert Camp Johnson entered in the Justice Court of Yazoo County, Mississippi, in the amount of \$995.68 enrolled in the Judgement Roll maintained by the Yazoo County Circuit Clerk and filed under case number YV2025/0039 on her homestead located at 427 W 5th St Yazoo City, Mississippi, 39194 being more fully described as follows:

Lots 35 and 37 of Delta Acres Subdivision of Yazoo City, Mississippi

II.

That the Debtor seeks an Order from this Court voiding the judgment listed in Paragraph II. above to the extent it is a lien against his homestead and impairs the debtor's right to claim his homestead exemption pursuant to §85-3-21, Mississippi Code of 1972.

WHEREFORE, Debtor respectfully requests that this Court enter an order voiding the lien of Lots 35 and 37 of Delta Acres Subdivision of Yazoo City, Mississippi against him which impairs his homestead exemption, and for such other relief as is deemed just.

Dated July 16, 2025

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to Partially Avoid Lien was forwarded on July 22 2025, to the creditor, case trustee and U.S. Trustee as indicated in the “21 day notice” that accompanies this Objection.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice of Right to Request Hearing and Motion to Partially Avoid Lien was forwarded on July 22, 2025, to:

By First Class U.S. Mail, Postage Prepaid:

Smith Rouchon & Associates
c/o Robert Camp Johnson
P.O. Box 529
Jackson, MS 39205-0529

By Electronic CM/ECF Notice:

Case Trustee
U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
SHELIA DENISE STIFF

CASE NO: 25-00984

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/22/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Partially Avoid Judicial Lien

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/22/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
SHELIA DENISE STIFF

CASE NO: 25-00984

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/22/2025, a copy of the following documents, described below,
Notice and Motion to Partially Avoid Judicial Lien

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/22/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

SMITH ROUCHON & ASSOCIATES
C/O ROBERT CAMP JOHNSON
P.O. BOX 529
JACKSON MS 39205-0529